31 December 2004
Ms. Marlene H. Dortch,
Secretary,
Federal Communications Commission
445 12th Street, SW, Washington, DC 20554

RE: Docket No. 04-233, Localism

Dear Ms. Dortch,

Meyer Communications, Inc. is a 42-year-old, Springfield-based media company. It currently operates four radio stations in the Springfield market: KTXR-FM, KWTO-AM, KWTO-FM and KBFL-FM. Our competitors include Clear Channel, Journal Broadcast Group and Mid-West Family Broadcasters. Meyer Communications is the only locally-owned cluster remaining in this market.

Meyer Communications believes in localism. Its staff members serve on some 25 community service organization boards, including the American Red Cross, Cox Health Systems, the Southwest Missouri Sheltered Workshop, Students in Free Enterprise, the Council of Churches of the Ozarks foundation, and the local ALS Society, to name a few. It's news director has served on the Missouri Associated Press

board of directors for over 10 years. The stations have sponsored some two-dozen community events this year; everything from an Alzheimer's memory walk to a toy and financial aid drive for the Salvation Army.

But the point we want to stress is locally produced, locally-oriented programming, which three of our stations do extensively. For example:

101.3 KTXR, known regionally as 'the Gentle Giant', is the most music-intensive of the stations, currently playing a Lite Hits/AC format. All music is programmed locally, and

all air talent lives in the Springfield metro. Air personality Wayne Glenn, who has been on the station for 27 years, hosts 10 and a half hours of in-studio request shows each weekend, and many times he will play both new and historic recordings from Ozarks artists, plus a selection of music not often heard on any station, let alone a full class-C FM. And KTXR carries the complete schedules of the

Southwest Missouri State University football and men's and women's basketball teams; that amounts to over 80 games a year and over 400 hours of locally-produced sports.

KWTO-FM, known as Jock 98.7, carries all-sports programming. A two-hour morning sports program pits a local newspaper writer and TV sports director against each other and a call-in audience. Jock's own sports staff does an additional two-hour locally-produced sports talk show in the afternoon, plus five one-hour weekday specialty shows with local hosts on auto racing, fishing, classic cars, fitness and exercise and sports trivia. Add a two-hour high school sports show with local hosts and coaches on Saturday mornings, and there's a total of 33 hours of local talk weekly. The station carries Southwest Missouri State baseball, Drury University men's and women's basketball, has

carried the Springfield-Ozark Ducks minor league professional baseball team, and will produce the new minor league Springfield Cardinals' 142 games this spring and summer. Add in some 100 high school sports events, and that's an estimated 1500 hours of locally-produced

programming a year, done by a staff of four full-time and six part-time people.

KWTO-AM 560 is the lone remaining heritage AM in the market; same calls and frequency since 1933 and currently news-talk. It does a live, local talk show, Morning Line, seven days a week; $\,$ 6 till 10 weekdays and 6-8:30 weekends. And most weekdays, hosts are on-site, in the community,

rather than in the studio. Our policy is to require quests to come to the studio or remote site; only a few are on the phone from somewhere else. Instead of grabbing onto

nationally-syndicated 'how-to' shows, shows done by local merchants and experts in law, finance, gardening, communications and transportation are heard live between 10 and 11 AM and 2 and 4 PM weekdays; plus an additional two hours on Saturday. AM 560 has it's own program hosted by three regular Springfield women for an hour each Monday afternoon, plus a daily local agriculture report. Nearly one-quarter of KWTO-AM's weekly programming is produced in Springfield; not counting the station's 26 daily local newscasts.

And even though our fourth station, 99.9 KBFL, is a satellite-delivered adult standards station, it also carries local elements for the Buffalo-Springfield community, including local news and community notes, agriculture and sports; all of which are produced here and preempt the satellite feed. KBFL is the home for Southwest Baptist University in nearby Bolivar's football, men's and women's basketball, and is also used to broadcast those

local sports events which Jock 98.7 can't carry.

In the locally-produced news and public affairs area, Meyer Communications' Ozarks News Network produces 26 newscasts daily, which are then fed to all four stations. KWTO-AM carries all 26, KTXR carries 12; KWTO-FM six and KBFL, four. ONN newscasts are strictly local and regional, and air in addition to network affiliations. You'll find us at city council, county commission, school board and university

board meetings. AM 560's 'Morning Line' often focuses on local issues and topics. The award-winning weekly program "At Issue" is heard on all four stations; it has interviews with local leaders and citizens, and allows the public to

hear expanded versions of stories originating from ONN newscasts. ONN stories are posted and updated on the stations' website, radiospringfield.com.

Management allows us to interrupt programming to provide emergency weather or Amber Alert messages, as provided through our EAS, National Weather Service and Missouri State Highway Patrol connections. A contract with The Weather Channel allows for full coverage when the newsroom may be unstaffed, especially overnights and weekends. Our SnowWatch delivers school closings, when necessary, for nearly 270 school districts, private and special schools across the Ozarks. And there is always an operator on duty, with authority to broadcast emergency material.

Meyer Communications makes public service time available to local non-profits, church groups and community organizations. We estimate that approximately \$1 million a year of airtime

value is dedicated to public service.

We believe that, while other operations may have abandoned local programming for national playlists, formats and out-of-town voice tracking and news; local ownership,

management and staffing still has a place in broadcasting, and can lead, even in a top-150 market.

For review: KTXR is locally programmed 24 hours a day, every day. KWTO-FM has 33 hours of locally-produced programs every week. KWTO-AM has 41 hours weekly. And KBFL carries around an hour a day.

Sincerely,
Tom Ladd, Station Manager
R. J McAllister, News Director